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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

ZOE ALTERWITZ-GREENE,

Plaintiff,

vs.

STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, and DOES 1  
through 20,

Defendants.

CASE NO.: 2:21-cv-00504-RFB-DJA

~~Proposed~~ **JOINT DISCOVERY PLAN**  
**(SUBMITTED IN COMPLIANCE WITH**  
**LR 26-1(b))**

Plaintiff, Zoe Alterwitz-Greene, and Defendant, State Farm Mutual Automobile Insurance Company ("State Farm"), by and through their respective counsel, pursuant to Rule 26(f)(2) of the Federal Rules of Civil Procedure, and in compliance with LR 26-1(a) of the Local Rules of Practice for the United States District Court for the District of Nevada, hereby submit their proposed Joint Discovery Plan and Scheduling ("Discovery Order"). The parties agree to the dates provided under this proposed discovery plan during an FRCP conference held on April 7, 2021. The undersigned respectfully request that the Court enter a scheduling order in conformance with the following:

1. Discovery Cut-Off Date: Defendant, State Farm was served on July 14, 2020. State Farm filed its Notice of Removal on March 26, 2021. The parties request a discovery cut-off date of 180 days from the time of the removal to ensure a sufficient amount of time is

1 available for depositions and expert discovery. Therefore, the discovery cut-off date is  
2 September 21, 2021.

3 2. Amending Pleadings and Adding Parties: The last date for filing motions to amend the  
4 pleadings or add parties shall be no later than 90 days prior to the close of discovery.  
5 Therefore, the last date to file motions to amend pleadings or add parties is June 23,  
6 2021.

7  
8 3. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts): The last date for disclosure of expert  
9 witnesses shall be 60 days before the discovery cut-off date and the disclosure respecting  
10 rebuttal experts will be made 30 days after the initial disclosure of experts. Therefore,  
11 the last date for initial disclosure of experts is July 23, 2021, and the last date for rebuttal  
12 expert disclosures is August 23, 2021.

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14 4. Dispositive Motions: The last date for filing dispositive motions is 30 days after the  
15 discovery cut-off date. Therefore, the last date to file dispositive motions is October 21,  
16 2021.

17 5. Pretrial Order: The joint pre-trial order shall be filed no later than 30 days after the date  
18 set for filing dispositive motions. The last date to file pre-trial orders is November 22,  
19 2021 or 30 days from the date the Court issues its order as to any pending dispositive  
20 motions.

21  
22 6. Fed. R. Civ. P. 26(a)(3) Disclosures: Unless the discovery plan otherwise provides and  
23 the court so orders, the disclosures required by Fed. R. Civ. P. 26(a)(3) and any  
24 objections to them must be included in the joint pre-trial order.

25 7. Alternative Dispute Resolution: The parties certify that they met and conferred about the  
26 possibility of using alternative dispute-resolution processes including mediation,  
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arbitration, and if applicable, early neutral evaluation. The parties will further discuss the use of alternative dispute resolution processes after the close of discovery.

8. Alternative Forms of Case Disposition. The parties certify that they discussed whether to consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01). The parties do not consent to a trial by a magistrate judge, however, the parties are in discussions regarding the use of the Short Trial Program, but do not currently agree to a short trial.

9. Electronic Evidence: The parties certify that they discussed whether they intend to present evidence in electronic format to jurors for the purposes of jury deliberations. The parties shall prepare such electronic evidence in conformance with the court's policies and procedures.

Dated: April 20, 2021.

Vannah & Vannah

/s/ Matthew R. Vannah

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Attorney for Plaintiff,  
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Dated: April 20, 2021.


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**IT IS SO ORDERED.**

DATED this 21st day of April, 2021.

  
UNITED STATES MAGISTRATE JUDGE